

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,

Plaintiff,

vs.

SMARTTALENT LLC,

Defendant.

CASE NO. 2:22-cv-01102-RSM

**STIPULATED MOTION TO AMEND  
CONSENT DECREE**

The Consent Decree in this case was entered by the Court on August 6, 2024, and it required Defendant to provide an initial training, as described in Paragraph 72, within 90 days or by November 4, 2024. (Dkt. No. 24). Pursuant to Paragraph 7 of the Consent Decree, and for good cause, the parties seek leave to amend Paragraph 72 of the Consent Decree to extend the deadline for Defendant to provide the first training from 90 days to 150 days of the Entry Date. Good cause exists for this extension. Paragraph 73 of the Consent Decree required Defendant to select an Independent Consultant to develop and conduct the trainings described in Paragraph 72 and for Defendant to deliver the Independent Consultant's training materials 30 days in advance of the initial training. After researching and interviewing potential candidates, Defendant selected an Independent Consultant, to which EEOC did not object, on October 29, 2024. Given

STIPULATED MOTION TO AMEND  
CONSENT DECREE – 1  
(Case No. 2:22-cv-01102)

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1 this timeline, there is insufficient time for the Independent Consultant to prepare and deliver  
2 materials to the EEOC for review and comment and then provide the initial training. Thus, a 60-  
3 day extension of the deadline set forth in Paragraph 72 of the Consent Decree is warranted.  
4 Defendant also agrees to conduct the training required by Paragraph 72 at least six times for the  
5 duration of the Consent Decree.

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7 Dated: November 4, 2024

8  
9 GORDON REES SCULLY MANSUKHANI,  
LLP

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CONSENT DECREE – 2  
(Case No. 2:22-cv-01102)

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9 *Attorneys for Plaintiff EEOC*

10  
11 SO APPROVED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

12 \_\_\_\_\_  
13 The Honorable Ricardo S. Martinez  
14 Senior United States District Judge  
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STIPULATED MOTION TO AMEND  
CONSENT DECREE – 3  
(Case No. 2:22-cv-01102)

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF filing system, which will send notification to the following:

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DATED: November 4, 2024.

By: s/ Jacqueline Burrell  
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